The Chanda Smith Consent Decree
Los Angeles, CA

A Leadership Briefing Paper
September 8, 2004

Produced by

The Urban Special Education Leadership Collaborative
Arun K. Ramanathan, Researcher

Introduction

In 1993, lawyers from the American Civil Liberties Union (ACLU) and a private firm, Newman, Aaronson, & Vanaman, filed a class action lawsuit on behalf of students with disabilities in the Los Angeles Unified School District (LAUSD). The lawsuit alleged that the district's special education practices in the areas of child find, identification, tracking of student records, and placement were in violation of the requirements of the Individuals with Disabilities Education Act (IDEA).

The lawsuit was filed in the name of Chanda Smith, a child who had twice been retained in tenth grade, whose records had not followed from one LAUSD school to another and who had waited over two years to receive an evaluation for eligibility for special educational services. The plaintiffs sought changes in the district's special education child find and placement procedures and additional training for teachers in identifying children with disabilities. They also sought to have the district revise its enrollment form so that a parent could check off a box indicating that their child might have a disability. According to one of the attorneys for the plaintiffs, Mark Rosenbaum of the ACLU, the lawsuit's aims were so simple and limited and could be taken care of "by tomorrow." Similarly, an attorney for LAUSD referred to the problem as a simple one that should have been handled out of court (Mariani, November 1993; Chavez, November 1993).

Chanda Smith is now 27 years old. The lawsuit that bears her name has moved far beyond adding an additional checkbox on the district's student enrollment form. Over the last ten years, it morphed into a series of highly complex agreements that have attempted to promote systemic changes in LAUSD. The implementation of the consent decree has resulted in over $200 million in expenditures and engendered a lengthy legal process that has required the prolonged attention of lawyers, advocates, experts, and the courts.

The roots of this conflict can be traced to serious deficiencies in the LAUSD special education system. These deficiencies became evident in 1993 as the parties engaged in negotiations over the terms and conditions of a settlement. In October 1994, Senior U.S. District Court Judge Laughlin Walters approved an interim settlement that led to the hiring of two consultants, Lou Barber (LAUSD's choice), a former assistant superintendent of special education for the California Department of Education, and Mary Margaret Kerr (plaintiff's choice), a professor of child psychiatry at the University of Pittsburgh Medical Center with expertise in behavior disorders. These consultants were given the task of analyzing the LAUSD special education system and identifying areas that needed to be reformed. After a ten-month review, Barber and Kerr published a 191-page report describing the district as suffering from a "pervasive, substantial and systemic inability to deliver special education services in compliance with special education law." They identified 23 areas of noncompliance, including failure to:

- make a sufficient effort to find, identify and serve students with disabilities
- identify, assess and serve students within the timelines required by law
- operate designated instructional services in compliance with special education timelines and caseload limitations
- track students with respect to maintenance of and access to student records
- ensure meaningful representation, participation, and informed consent of parents

- comply with legal mandates concerning Least Restrictive Environment (LRE)
- provide effective staff development
- provide sufficient trained and certified staff (over 10% of the school districts special education teachers were on emergency credentials)
- reduce or eliminate disproportionate representation of racial and ethnic groups
- provide effective leadership of the special education department and include special education in district-wide planning (p. 48-51)

The consultants identified four main sources of these failures: 1) "entrenched and long-standing practices that marginalized the delivery of special education programs and services"; 2) an unwillingness on the part of the entire district to recognize that the education of students with disabilities was its responsibility; 3) a lack of "effective management, governance and internal oversight of special education programs and facilities"; 4) a lack of accountability resulting in "administrators, teachers and staff [who] engaged in substantial and repeated violations of special education laws." (p.56)

The consultant's findings were supported by the findings of the California Department of Education and the federal Office of Special Education Policy (OSEP). From 1992 to 1995, the California Department of Education received almost one thousand complaints from parents in LAUSD (SLDA, 1997). A 1995 OSEP report found that the district was out of compliance with IDEA, particularly in the areas of timely assessments and three-year evaluations, and that the state DOE had failed to hold the district accountable for its "systemic noncompliance" (Lipton, 2000).

The consultants offered a series of recommendations that went far beyond the scope of the initial lawsuit. Noting that the director of special education did not communicate directly with the superintendent, they recommended creating a permanent new position that would be part of any inner circle of top administrators making core decisions concerning the District as a whole. Noting the preference for LRE in IDEA, they sought to reduce the high rates of segregation of students with disabilities in special classrooms and schools. They encouraged the district to establish inclusive programs in neighborhood schools, close or integrate the district's 18 special education centers, and reduce rates of private placement. They proposed to create a computer system that linked schools and district offices to track referrals, placements, and educational progress. They stated that the district should conduct regular financial audits to maximize spending on special education, hire more certified special educators, conduct annual trainings for special and regular education staff, and establish a pre-referral intervention process to reduce inappropriate referrals. They also recommended that a consent decree administrator's office be authorized to hire consultants to develop implementation plans for a proposed consent decree. These recommendations were incorporated by the parties into a 58 page tentative settlement (Kindy, December 1995).

This settlement had a range of critics. The United Teachers of Los Angeles (UTLA) opposed the recommendations because of the school closings and the inclusion provisions. Other opponents expressed concerns about the costs of changes, noting that the consent decree did not specify how the recommendations would be funded. Some

parents groups, particularly those representing children in the special education schools expressed concerns that they were excluded from the settlement process.

In December 1995, on a 5-1 vote the Board of Education adopted the tentative settlement (Schnaiberg, January 1996; Kindy, December 1995). In January and February 1996, the district held three public hearings, during which a number of parents of children in segregated special education centers criticized the consent decree's emphasis on including students with disabilities in regular classrooms and closing the special schools (Schnaiberg, March 1996). Advocates for parents with children who were blind, deaf, and/or with severe disabilities in the special schools threatened legal action if the schools were closed (Kindy, January 1996). As a result of this criticism, the plaintiffs agreed to amend language in the settlement to keep the special education schools open. Additions were also made to ensure more parent input during the implementation of the consent decree.

On March 15th 1996, the LAUSD school board approved a revised *Chanda Smith* consent decree on a 6-0 vote. On April 15, 1996, Judge Laughlin Walters approved the negotiated settlement and signed the consent decree.

The Consent Decree

The *Chanda Smith* Consent Decree incorporated most of the recommendations of the consultants. It also incorporated a number of the conditions of the interim settlement around the identification and declassification of students with disabilities. In addition to detailing areas for reform, it established a complaint process, a procedure that the parties could use to amend the consent decree, and guidelines for attorneys fees and expenses (*Chanda Smith et al. v. Los Angeles Unified School District, et al.*).

Initially, the consent decree was considered by some advocates to be overly vague (Pyle, April 1996). The parties noted that this lack of specificity resulted from their desire to work out the details over the course of the settlement. Drs. Barber and Kerr were appointed as co-consent decree administrators (CDAs) and charged with the task of working out these details over a 31-month period, including developing budgets and implementation plans to bring the district into compliance with IDEA. The consent decree created an independent administrator's office, which by 2000 had 11 full-time employees and 20 consultants (Sheppard, May 2000). The efforts of this office were expected to result in the development of 30 implementation plans. This goal was later reduced to 24 plans and then 20. Currently, there are 17 implementation plans touching on nearly every area of special education from LRE to post-school transition.

To help the consent decree administrators develop the implementation plans and budgets, the settlement created a Community Planning Committee. This committee had 14 subcommittees which met once a month and were responsible for contributing to one or more of the implementation plans. Each subcommittee had 25 members, the majority of whom had to be parents of children with disabilities in LAUSD schools, and two chairpersons, one of whom had to be a parent of a child with disabilities. The chairs and

co-chairs formed an Executive Committee that was responsible for appointing all of the members of a twenty-member class review committee composed of parents (Protection and Advocacy, 1997).

The committees and administrators had five years to develop the plans, each of which had to be approved by the Board of Education and then the court. This goal proved to be overly-optimistic. Instead, the plans appeared at sporadic intervals over the course of the next seven years.

Complications

The consent agreement was criticized from the beginning for resulting in high legal fees. The UTLA criticized the attorneys and consultants hired to oversee the consent decree for spending half their first-year's funding on fees. This caused the Board of Education to ask for a revised budget (Kindy, June 1996). As the cost of legal and administrative fees rose to more than $4.5 million in the first six months, some Board members criticized the consent decree administrators for reporting excessive costs (Pyle, September 1996; Daily News, June 1996).

In December 1996, the Board released the district's new mission statement. This statement incorporated language on effectively educating and supporting all students in LAUSD's special education system. Some observers hailed the statement as a long overdue message of inclusion while others criticized the statement as overly vague and unnecessarily expensive to implement (Pyle, December 1996).

In February 1997, LAUSD's special education director, Beverly Watkins retired. Watkins complained that her position was being undermined by the consent decree administrators and by the shifting of some of her responsibilities to departments in general education. She also criticized the CDA office for issuing conflicting directives and guidance to field staff and providing inadequate training for principals and regional administrators in the new requirements (Hardy, February 1997; Pyle, February 1997).

The second implementation plan focused on budgeting. This plan was criticized for a planned 20% reduction in private placements, a number which parents called arbitrary (Hardy, February 1997). In March 1997, the CDA office recommended that LAUSD spend $10 million to fill a shortage of 300 teachers qualified to teach students with physical and emotional disabilities. The plan included a $2,500 stipend for each current special education teacher, 1-3% annual raises for each new teacher, a tuition loan program, and over $400,000 for extra teacher recruitment efforts (LA Times, November 1997; Education Week, December 1997). The district was unable to follow through on most of these recommendations.

By 1998, the administrators had still not completed most of the implementation plans. The special education computer system was not expected to be working for another three years. In the meantime, the district was being criticized for a surge in special education placements, particularly among minorities. Opponents of the consent decree noted that

the rise in placements (from 1 in 10 to 1 in 9 of all students) coincided with the consent decree's implementation (Sahagun, May 1999). Proponents noted that this could be expected since the one of the goals in the consent decree was to improve the child find and identification systems in LAUSD.

In 1999 the CDA office crafted a proposal to establish 420 positions to oversee special education at every elementary school, thereby improving the school's assessment and placement processes (Sahagun, May 1999). This proposal was criticized for creating another layer of administrators. Critics also continued to attack the CDA office. Among the complaints were: high administrative costs, slow progress, increasingly complex implementation plans, and the lack of accountability (i.e., the lack of consequences for the CDAs when the district remained out of compliance).

In 2001, the LAUSD presented a strategic plan for improving outcomes for students with disabilities. The plan established a series of expected outcomes for meeting special education timelines, hiring qualified personnel, achieving integration with non-disabled peers, meeting high standards for academic and non-academic achievement, and measuring student outcomes that the school district hoped to meet over the course of the next five years. These included "reducing non-compliance with annual and triennial IEP timelines by 2%; increasing the percentage of students with disabilities graduating with a diploma to 40% by 2004; and "educating 81% of all students with disabilities in the general education classroom 80% or more of the school day." The district also identified general strategies for achieving these outcomes (LAUSD, 2001).

Outcomes - Current Status

By 2001 the cooperation between the plaintiffs and the school district began to break down. The LAUSD Board of Education and newly hired superintendent Roy Romer signaled their discomfort with the longevity, high expenditures, and oversight efforts of the CDA office. This criticism angered the plaintiffs and their counsels (Sheppard, March 2001). The tension intensified after a news conference in which Romer joked that *Chanda Smith* was "some form of worship" and compared the consent decree's effects on the district to the ropes that the Lilliputians used to tie down Gulliver (Smith, August 2001).

Mark Rosenbaum, legal director for the ACLU, called for Romer to be removed and, together with the other counsel for the plaintiffs, filed a complaint against LAUSD for a "deliberate, massive and wholesale breakdown of compliance" (Smith, August, 2001; Kerr, August 2001). Among the violations cited by plaintiffs were the district's failure to implement the information management system, provide speech and language services, complete compliance reviews and train school compliance teams (ACLU, 2001; Special Education Report, August 2001).

Shortly after, the district filed a motion to modify the consent decree, calling it costly, unwieldy and overly prescriptive. The motion asked for the elimination of the two court-appointed monitors and the dissolution of the parent subcommittees, and the creation of a

more flexible management structure (Werner, August 2001; Giordani, September 2001). As this was occurring, the Board of Education rejected the last four of the sixteen implementation plans that had been developed by the parent committees.

On September 25, 2001, Circuit Court Judge Ronald Lew denied the district's request to modify the consent decree and overruled the board's rejection of the four plans, declaring them adopted. He noted that the school district had failed to show that the consent decree administrators had failed in their jobs and, thus, denied the motion to dismiss them (Giordani, September 2001). However, Judge Lew also expressed concerns about the longevity of the case (Smith, September 2001). When the district appealed this decision, it was encouraged to enter into mediation with the plaintiffs. Shortly after, the parties re-opened negotiations.

In January 2002, the district began to implement its LRE initiative. The initiative sought to correct the low rates of inclusion in LAUSD (only 18% of students with disabilities attended regular classes) by requiring that 71% of all students with disabilities spend at least 80% of their school day in regular education by 2003. It also required the inclusion of children with disabilities into neighborhood schools and the integration of special education centers. It specified that all schools would have a special education enrollment from 7-17% by 2003. This plan raised the concerns of the parents of the over 4500 children in the special schools and as a result, the plaintiffs entered into negotiations with the district to modify the LRE plan to exempt the Centers (Hayakashi & Moore, January 2002).

In October 2002, Judge Lew accepted an agreement to amend the LRE initiative to exempt the district's 18 special education centers for students with moderate to severe disabilities from having to integrate or send their students to regular education classrooms (Hayakashi & Moore, October 2002). The move was hailed by advocates for the schools and school district administrators who argued that the centers represented the most appropriate placement for students with severe disabilities (Sodders, October 2002; Special Education Report, October 2002). Some advocates called the plan a necessary compromise to ensure the integration of other schools in the system.

Meanwhile, the parties in *Chanda Smith* continued to negotiate over the specifics of the consent decree, in particular the monitoring structure and the specificity of the implementation plans with the hope of creating a more streamlined outcomes-based agreement with alternative performance targets and accountability measures.

Conclusion

Chanda Smith is now a mother of three and a special education paraprofessional who wants to be a special education teacher (Edwards, August 2003). Much as she has "come a long way" since her second junior year of high school, so has the consent decree that bears her name. Indeed, the expansive goals of the consent decree bear little resemblance to the limited goals of her initial lawsuit.

Certainly, the consent decree appears to have led to improvements in the status and quality of the special education system. The district has improved its procedural compliance. However, its progress, even in these areas, has been slowed by four factors: the gradual nature of the development of the implementation plans, the often dramatic systemic changes that these plans require, the lack of specific timelines for implementation, and the lack of any apparent accountability mechanisms when the district failed to comply with timelines. The monitoring system through the CDA office has become far more complicated than initially envisioned and there are legitimate concerns that the process of administering the consent decree has assumed process over product. It will be interesting to see if the current negotiations result in a shift in this paradigm to a greater emphasis on student outcomes, improved programs, and accountability.

Post Script

In April 2003, after several months of intensive negotiations mediated by Dr. Thomas Hehir, Senior Lecturer at the Harvard Graduate School of Education and the Collaborative's Senior Policy Advisor, the Los Angeles Unified School District and the *Chanda Smith* plaintiffs reached an agreement on a modified consent decree. This decree was approved by the Board of Education on May 13, 2003, and the court on May 16, 2003.

The agreement replaced the CDAs' office and Drs. Kerr and Barber with a single court monitor, Dr. Carl Cohn, the former longtime superintendent of Long Beach Unified School District. Unlike the CDAs who reported to the court, as court monitor Dr. Cohn is provided with "full and final authority to work with and, if necessary, order the school district to comply with the decree." The parent committees in the original plan will be replaced by a single parent council with the duty of reviewing the school district's implementation of the decree.

The seventeen implementation plans developed over the previous seven years have been replaced with a series of objective and measurable outcomes that the school district is expected to meet over the course of the next three years (i.e., June 2006). These objectives include: increasing the percentage of students with disabilities taking the state-wide achievement test to 75% district-wide; increasing the graduation rate of students with disabilities by at least 5% each year; reducing the long-term suspension of students with disabilities; substantially increasing the percentage of students with disabilities educated in regular classrooms at least 60% of the school day; increasing the percentage of timely evaluations and translations, and reducing disproportionality and due process hearings. A number of other objectives such as the provision of appropriate behavior interventions, parent participation at IEP meetings, and delivery of services were left for the court monitor's office to establish after a review of existing data. The district is required to submit an annual plan on the steps that it intends to take in order to achieve these outcomes. This report must be approved by the court monitor's office after a period of public comment. The school district submitted its first annual plan to the monitor's office in early June and is expected to post it on its website—http://www.lausd.k12.ca.us/—to receive public comment in late June 2003.

Bibliography

Americans Civil Liberties Union. (2001, August 14). ACLU charges Los Angeles school district for failing to fulfill its promises to special education students. *Press Release*. Retrieved on January 15, 2003 from http://archive.aclu.org/news/2001/n081401a.html

Chanda Smith v. LAUSD, Case No. CV 93-7044-LEW Retrieved on December 27, 2002 from http://dse-web.lausd.k12.ca.us/Chanda/indexcscd.html or http://dse-web.lausd.k12.ca.us/docs/CDA/cdContents.htm

Barber, L., & Kerr, M. M. (1995). Consultants report: Chanda smith v. LAUSD, Case No. CV 93-7044-LEW. Retrieved on December 27, 2002 from http://dse-web.lausd.k12.ca.us/docs/CDA/cdContents.htm

Bloom D. (1996, March 15). LAUSD board oks decree. *Daily News of Los Angeles*. Retrieved on January 27, 2003 from http://www.dailynews.com/

Chanda Smith, et al., v. LAUSD, et al. *Implementation Plans: 1-16*. Retrieved on January 3, 2003 from http://dse-web.lausd.k12.ca.us/Chanda/plans/indexplans.html

Chavez, S. (1993, November 23). Schools sued over access to special classes education. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Chiang. S. (1997, March 9). District refining special education. *Daily News of Los Angeles*. Retrieved on January 22, 2003 from http://www.dailynews.com/

Daily News of Los Angeles. (1996, June 12). Editorial: What about the children: Special-education litigation is unduly rewarding for lawyers, consultants. *Daily News of Los Angeles*. Retrieved on January 27, 2003 from http://www.dailynews.com/

Daily News of Los Angeles. (1996, March 6). Editorial: Special ed. price tag as settlement drags on: District should seek intermediate reforms. *Daily News of Los Angeles*. Retrieved on January 27, 2003 from http://www.dailynews.com/

Daily News of Los Angeles. (1996, February 9). Editorial: Victory for parents. *Daily News of Los Angeles*. Retrieved on January 27, 2003 from http://www.dailynews.com/

Daily News of Los Angeles. (1995, December 11). Editorial: LAUSD's new problem. *Daily News of Los Angeles*. Retrieved on January 27, 2003 from http://www.dailynews.com/

Education Week. (1997, December 10). Boost for special ed. teachers? *Education Week*, 17(16), 5-6.

Edwards, H. (2002, August 26). Smith keeping and eye out for special ed. *Daily News of Los Angeles*. Retrieved on January 22, 2003 from http://www.dailynews.com/

Giordani, S. (2001, September 25). LAUSD's decree bid fails. *Daily News of Los Angeles*. Retrieved on January 25, 2003 from http://www.dailynews.com/

Giordani, S. (2001, September 24). Los Angeles school district seeking leeway on consent decree. *Daily News of Los Angeles*. Retrieved on January 25, 2003 from http://www.dailynews.com/

Hayakashi, E., & Moore, S. (2002, October 4). L.A. unified to keep 16 schools segregated for special education. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Hayakashi, E., & Moore, S. (2002, January 31). L.A. to integrate disabled pupils. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Hardy, T. (1997, February 4). Director quits LAUSD's special education unit. *Daily News of Los Angeles*. Retrieved on January 25, 2003 from http://www.dailynews.com/

Helfand, D. (2001, February 2001). Special needs raise pressure on schools. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Hillberg, B. (2000, October 1). LAUSD works to reform learning for disabled. *Daily News of Los Angeles*. Retrieved on January 25, 2003 from http://www.dailynews.com/

Kindy, K. (1995, December 3). LAUSD settlement nears. *Daily News of Los Angeles*. Retrieved on January 20, 2003 from http://www.dailynews.com/

Kindy, K. (1995, December 10). LAUSD to ok settlement. *Daily News of Los Angeles*. Retrieved on January 20, 2003 from http://www.dailynews.com/

Kindy, K. (1995, December 12). Board settles lawsuit. *Daily News of Los Angeles*. Retrieved on January 20, 2003 from http://www.dailynews.com/

Kindy, K. (1996, June 11). Special-ed reform creates a stir. *Daily News of Los Angeles*. Retrieved on January 20, 2003 from http://www.dailynews.com/

Kindy, K. (1996, January 30). Special education's fate worries parents. *Daily News of Los Angeles*. Retrieved on January 20, 2003 from http://www.dailynews.com/

Lipton, D. (2000, March 1). *Testimony of Diane Lipton: Hearing on state compliance with IDEA*. Sacramento, CA: Assembly Committee on Education. Retrieved on January 30, 2003 from http://www.dredf.org/march1.html

Los Angeles Times. (2001, July 30). Editorial: The thicket of special ed. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Los Angeles Times. (1997, November 25). Plan urges hiring of more teachers. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Los Angeles Unified School District: Division of Special Education. (2001). Schools for all children: A strategic plan for achieving measurable results for all students including those with disabilities. Los Angeles, CA: Author. Retrieved on December 10, 2002 from http://dse-web.lausd.k12.ca.us/docs/strategicplan.pdf

Mariani, J. (1993, November 23). Student claims special education needs overlooked. *Daily News of Los Angeles*. Retrieved on January 20, 2003 from http://www.dailynews.com/

Parents Resource Network. (2003). *History of Chanda Smith Consent Decree*. Los Angeles: Specially Funded & Parent/Community Programs Director. Retrieved on January 6, 2003 from http://sfpc.k12.ca.us/prnweb/History.asp

Protection and Advocacy Inc. (1997). Chanda smith consent decree on track. *PAI newsletter*, 62, 1. Retrieved on January 20, 2003 from http://www.pai-ca.org/newsltrs/issue62/chanda.htm

Pyle, A. (1997, February 4). District head of special education quits. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Pyle, A. (1996, December 17). L.A. school board gets plan to re-integrate disabled students. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Pyle, A. (1996, September 4). 2 on L.A. school board assail fees for special education suit. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Pyle, A. (1996, April 16). Judge's OK opens door to overhaul of special education. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Pyle, A. (1996, January 31). Advocates fear threat to schools for disabled. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Pyle, A. (1995, December 12). Education for the disabled faces reform. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Pyle, A. (1995, December 10). L.A. on the verge of overhauling special education. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Reynolda, L. (1997). *The effects of LAUSD reorganization on special education.* Unpublished Thesis. Los Angeles: University of Southern California. Retrieved on January 23, 2003 from http://www.gseis.ucla.edu/gseisdoc/study/special.html

Sacramento Learning Disabilities Association. (1997). Largest special education program in California operates under court ordered consent decree. *Special Education Observer*, 9. Retrieved on December 15, 2002 http://www.sacramentolda.org/observer/obs09/consent.htm

Sahagun, L. (1999, May 23). Surge in L.A. special ed. placements questioned. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Schnaiberg, L. (1996, January 10). In wake of suit L.A. moves to revamp spec.-ed. system. *Education Week*, 15(16), 6.

Schnaiberg, L. (1996, March 20). L.A. board backs overhaul of special-education system. *Education Week*, 15(26), 11.

Sheppard, H. (2001, March 14). LAUSD blasted on special ed: Romer to weigh options on consent decree. *Daily News of Los Angeles*. Retrieved on January 22, 2003 from http://www.dailynews.com/

Sheppard, H. (2000, May 14). Giving away L.A.? Consent decrees are shifting city power to federal judges. *Daily News of Los Angeles*. Retrieved on January 22, 2003 from http://www.dailynews.com/

Smith, D. (2001, September 25). Los Angeles: Judge rejects district challenge to special ed. panels. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Smith, D. (2001, August 15). Fight erupts over decree for special education. *Los Angeles Times*. Retrieved on January 16, 2003 from http://pqasb.pqarchiver.com/latimes/

Sodders, L. M. (2002, October 26). Ruling saves the special education centers. *Daily News of Los Angeles*. Retrieved on January 22, 2003 from http://www.dailynews.com/

Special Education Report (2002, October 26). L.A. Special ed. schools won't integrate, judge says. *Special Education Report*. 7.

Special Education Report (2001, August 29). ACLU: L.A. has not abided by special ed. agreement. *Special Education Report*. 3.

Werner, E. (2001, August 15). ACLU files complaint. *Daily News of Los Angeles*. Retrieved on January 26, 2003 from http://www.dailynews.com/